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January 18, 2002

Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC94-102, CC95-116, CC99-200, WT01-184, ex parte communication

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Rules, this is to advise that representatives of the National Emergency Number Association ("NENA") and the Association of Public-Safety Communications Officials-International, Inc. ("APCO") met today by teleconference with staff members in the Chief's Office and the Policy Division of the Wireless Telecommunications Bureau. The general subject was potential effects on wireless and wireline access to 9-1-1 emergency calling services from the implementation, later this year, of wireless carrier number portability and wireless carrier number pooling.

The public safety representatives emphasized that their concern was for management and mitigation of these effects and was not directed to the merits of wireless number pooling and number portability or the current common deadline of November 24, 2002.

The representatives noted that a customer terminating wireline telephone service in favor of wireless service might experience, temporarily, a degradation of 9-1-1 service, depending on the relative levels of that service provided by the losing (wireline) and gaining (wireless) carriers. To a lesser degree, there could be service differentials in a customer's replacement of one wireless carrier by another, again depending on the nature of the 9-1-1 service then provided by the losing and gaining carriers. The representatives observed that Sections 52.23(a) and 52.31(a) of the Rules appeared to favor continuity of comparable service.

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Finally, the representatives expressed concern that carriers are not making adequate provision for testing of wireless number portability prior to the November deadline, and urged the FCC to consider how it might intervene to require or encourage such testing. Conceivably, a national forum could be convened in short order to assist the process.

The technical issues which need to be, and can be, resolved are common to pooling and porting. Given the recent affirmation of the November 24th date for pooling, it behooves wireless carriers, PSAPs and the FCC to collaborate in assuring the readiness of their respective systems and practices, independently of the ultimate decision on wireless porting.

The public safety representatives in the teleconference were Robert M. Gurss, counsel to APCO; Richard Jones, 9-1-1 Supervisor in the Loves Park, Illinois Police Department; and the undersigned, counsel to NENA. Among the FCC officials on the call were Kris Monteith, Chief of the Policy Division, and David Furth, Senior Legal Advisor to the Bureau Chief.

Please direct any questions to the undersigned.

Sincerely,

James R. Hobson

cc: Kris Monteith, David Furth, Bob Gurss, Rick Jones